

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

INNOVATION FIRST, INC., and  
INNOVATION FIRST LABS, INC.

Plaintiff,  
v.

URBAN TREND, LLC.; ROBERT G.  
KUSHNER; and MICHAEL STOLL

## Defendants.

Civil Action No. 3:10-cv-00934

¶

## **UNOPPOSED MOTION TO DISMISS**

COME NOW Plaintiffs Innovation First, Inc. and Innovation First Labs, Inc. (collectively, “Plaintiffs”), filing this Unopposed Motion to Dismiss, and would respectfully show the Court as follows:

Plaintiffs and Defendants Urban Trend, LLC, Robert G. Kushner and Michael Stoll (collectively, “Defendants”) have resolved all claims between or among them. Accordingly, Plaintiffs seek dismissal of the claims that they have brought against Defendants in this action with prejudice, each side to bear its own costs and fees.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that the Court enter the proposed order of dismissal filed contemporaneously with this Motion.

Dated: March 7, 2011

Respectfully submitted,

**FISH & RICHARDSON P.C.**

By: /s/ Kelly D. Hine

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**Counsel for Plaintiffs,  
INNOVATION FIRST, INC. and  
INNOVATION FIRST LABS, INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 7, 2011, to Defendants' counsel of record via CM/ECF.

/s/ Kelly D. Hine

Kelly D. Hine